

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD)
)
and)
)
ALISON DREITH,)
)
on behalf of themselves and a class of)
similarly situated individuals,)
)
Plaintiffs,)
)
v.) Case No.: 4:17-CV-2455 RLW
CITY OF ST. LOUIS, MISSOURI,)
)
Defendant.)

AFFIDAVIT OF JON ZIEGLER

I, Jon Ziegler, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
2. I am an independent journalist.
3. I came to the St. Louis area to cover the protests following the acquittal of Officer Jason Stockley.
4. On the evening of Friday, September 15, 2017, I was in the Central West End neighborhood of the City of St. Louis to cover the protest.
5. The St. Louis Metropolitan police officers deployed chemical agents against me and other people.
6. The police also used bright flashlights to prevent me from using my cameras.

EXHIBIT L

7. I informed one police officer that I suffer from seizures, and then two officers immediately began using their flashlights on strobe mode.

8. On the evening of Sunday, September 17, 2017, I saw police officers follow protestors and journalists, indiscriminately pepper spraying out of unmarked police vehicles. I also saw police officer use pepper balls.

9. I also twice saw police officers jumping out of vans with less-lethal shotguns, sometimes referred to as rubber bullets, and opening fire in a fashion that seemed random and arbitrary to me.

10. I heard a police officer make an announcement over the PA of a police vehicle to move to the north and west (toward Tucker and Washington).

11. Around 11:20 p.m., I was walking around recording video on the sidewalk near the intersection of Tucker and Washington.

12. Then suddenly riot lines of police officers formed around the intersection.

13. There was no warning given that people would get trapped inside.

14. When I realized I was getting trapped, I went to every corner of the intersection, and police told me to go out another way.

15. I saw people outside the perimeter of the kettle being dragged into the kettle by police officers.

16. At this point police moved in from all sides and ordered us to get down.

17. I complied immediately by crouching to the ground.

18. I had a camera on a tripod that stayed upright so as not to hit anyone around me.

There was not enough room for everyone to get down.

19. I tried to fold the legs of my tripod.

20. Once I was on the ground, I was sprayed directly with pepper spray by multiple police officers, though I was unarmed, nonresisting, and following their directives.

21. I heard no warning.

22. At least six times, different officers sprayed me directly at point-blank range.

23. As other pedestrians were arrested and dragged away, I was able to lay down flat and so I laid down on my stomach.

24. I was handcuffed with zip ties.

25. After I was handcuffed, an officer told me to shut up and pepper sprayed me in the mouth.

26. After that the officer used either a knee or foot on my back and proceeded to grind my face into the concrete.

27. I personally recorded three videos of these events, two with my iPhone and one with an HD camera. The two videos recorded with my phone were via livestream.

28. The videos are attached on a DVD.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on 9/22/17

Jon Ziegler

Subscribed and sworn to before me this 22nd day of September 2017



KATHRYN M. HINNERS-MUELLER
My Commission Expires
May 12, 2018
St. Louis City
Commission #14014958

Kathryn M. Hinnens-Mueller
Notary Public